

1 DANIEL G. BOGDEN
2 United States Attorney
3 Nevada State Bar No. 2137
MICHAEL A. HUMPHREYS
Assistant United States Attorney
Lloyd D. George United States Courthouse
4 333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
5 Telephone: (702) 388-6336 Facsimile: (702) 388-6787
Counsel for Plaintiff

6
7 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,)
9 Plaintiff,)
10 v.) 2:10-CR-286-PMP (GWF)
11 KAREN TAPPERT)
12 Defendant.)
13

14 **UNITED STATES' UNOPPOSED MOTION**
TO CONTINUE THE DATE FOR THE UNITED
STATES TO RESPOND TO ENTITLE DIRECT'S
OPPOSITION TO THE UNITED STATES' MOTION
TO DISMISS ENTITLE'S THIRD-PARTY CLAIM

17 The United States of America by and through Daniel G. Bogden, United States
18 Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States
19 Attorney, respectfully moves this Court to grant a thirty-day continuance for the United
20 States to file its reply memorandum to Entitle Direct's Opposition to the United States'
21 Motion To Dismiss the Third-Party claim of Entitle Direct. The United States' Reply
22 Memorandum is due August 13, 2013.

23 For its grounds, the United States says that the undersigned Assistant United States
24 Attorney, assigned to this case, was outside of the office for two weeks, from July 29 until
25 August 12, 2013, and was unaware of a Court order setting a deadline for filing a reply until
26 his return to the office on August 12th.

1 Entitle has filed a comprehensive response which includes a set of exhibits with what
2 appears to be at least 200 pages of documents. Given the complexity of Entitle's opposition
3 memorandum and the volume of exhibits presented by Entitle that Government counsel must
4 review before he can prepare an adequate response, that task cannot be completed in the one
5 day that Government counsel has left to him since learning of the Government's filing
6 deadline for its reply memorandum on August 12th. Government counsel has spoken to Alan
7 Doran, Executive Vice-President of Entitle Group, and he has given Government counsel
8 permission to inform this Court, through this motion, that he consents to this motion.

9 This motion is not submitted solely for the purpose to delay or for any other improper
10 purpose.

11 WHEREFORE, the United States moves this Court to grant its motion to extend the
12 time for the United States to file its reply memorandum an additional thirty (30) days; or until
13 September 4, 2013.

14 . . .

15 . . .

16 . . .

17 . . .

18 . . .

19 . . .

20 . . .

21 . . .

22 . . .

23 . . .

24 . . .

25 . . .

1 Likewise, the Government request that this Court correspondingly, set back the
2 hearing date, currently scheduled for September 11, 2013, to a date that is consistent with the
3 granting of the United States motion to continue; viz., after September 13, 2013.

4

5 DATED this 13th day of August 2013.

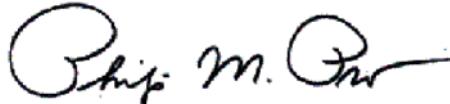
6 Respectfully submitted,
7 DANIEL G. BOGDEN
United States Attorney

8 United States reply to Entitle Direct's
9 response to United States' Motion to
Dismiss Third-Party Claim is due
10 September 4, 2013.

11 The motion hearing set for 9/4/13 at
10:30 AM is VACATED. Motion
12 hearing re-set to 10/15/13 at 2:30
PM.

/s/Michael A. Humphreys
MICHAEL A. HUMPHREYS

IT IS SO ORDERED:



13 U.S. District Court Judge

14 DATED: August 14, 2013

15

16

17

18 CERTIFICATE OF SERVICE

19 It is hereby certified that service of the foregoing UNITED STATES' UNOPPOSED
20 MOTION TO CONTINUE UNITED STATES' DEADLINE TO FILE A REPLY
MEMORANDUM was made by sending a copy of same by first class mail, addressed to the
21 following addressee, on this 14th day of August, 2013:

22 Alan M. Doran
23 Executive Vice-President
Entitle Direct Group, Inc.
281 Dresser Blvd.
24 Stamford, CT 06901

/s/ Ray Southwick